



Clean Harbors Environmental Services, Inc.
2549 North New York Avenue
Wichita, KS 67219
(316) 269-7400

May 19, 2008

Mr. Akhter Hossain
Bureau of Waste management
Kansas Department of Health and Environment
Curtis State Office Building
1000 SW Jackson Street. Suite 320
Topeka, KS 66612-1366

RE: Clean Harbors Wichita, LLC Part B Application

Dear Mr. Hossain:

This is an updated Part B Application for the Clean Harbors Wichita, LLC Facility. Clean Harbors Environmental Services Incorporated anticipates formally **filing for partial closure of all RCRA permitted areas, except for Building C and the liquid storage tanks and tanker unloading bay in the Process Building.** We anticipate formally notifying KDHE of the exact areas to be partially closed within 60 days. At that time, updated Sections dealing with closure costs, procedures will be provided as amendments to this Part B Application.

Sections B, C, D, E, F, G and H have been updated to reflect the anticipated status of this facility. Because of the impact of eliminating several areas from the permitted facility, Sections J, K, L, M N, and Y have not been significantly revised at this time.

Clean harbors Environmental Services Inc., operations staff and environmental staff look forward to meeting with both KDHE and representatives of EPA Region VII at the earliest time convenient to all parties.

Thank you for your time and under standing, as Clean Harbors Kansas, LLC restructures it's operations to accurately reflect the current demand for environmental services.

If you have any questions, please contact me at (580) 697-3520, or grater.lee@cleanharbors.com.

Sincerely,

Lee R. Grater
Sr. Facility Compliance Manager
Clean Harbors Environmental Services

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Response to

PRELIMINARY ADMINISTRATIVE COMMENTS

Part A and Part B Permit Renewal Application dated _____
Clean Harbors Kansas, LLC
EPA ID No. KSD007246846
January 19, 2006

The following is Clean Harbor's response to the Kansas Department of Health and Environment (KDHE) Preliminary Administrative Comments on the Clean Harbors Kansas, LLC "RCRA Permit Application", dated October 2004. KDHE comments on the application are shown in bold and Clean Harbor's response is shown in italics. Please note that there are formatting changes to the RCRA Permit Renewal Application as a result of KDHE's comments. Words or sentences that were added or deleted from the renewal application were underlined or removed, respectively. In addition, the revision number and date of the renewal application were changed to Revision 10, March 17, 2008.

RCRA Subtitle C Site Identification Form

1. As the site contact person's name is not current on page 1 of 3, please update this page.

Clean Harbors Response: The site contact page has been updated.

Hazardous Waste Permit Information Form

2. As the facility contact person's name is not current on page 1 of 6, please update this page.

Clean Harbors Response: Current contact person's name has been provided.

3. On Page 6 of 6 drawings, diagrams, figures and maps contain the previous names of the facility, such as Hydrocarbon Recyclers, Inc., Laidlaw Environmental Inc. and

Safety-Kleen Inc. etc. Please remove the old names from all drawings, diagrams, figures and maps and update them with the current name of the facility.

Clean Harbors Response: The drawings have been revised.

4.It is difficult to read the information from Figure A.1; therefore, please provide a large-scale site map.

Clean Harbors Response: Map size has been increased.

5.Please remove the old names from Figures A.1 – A.8 drawings, diagrams, figures and maps and update them with the current name of the facility.

Clean Harbors Response: Facility drawings and maps have been updated to reflect current conditions.

6.A topographic map is required by 40 CFR 270.13(b),(1). As such a map is missing. Please submit a revised Part A Application with updated information (drawings, figures etc.), and original signature.

Clean Harbors Response: Topographic map has been provided.

Section B

7. In the 1st paragraph of page 3 the 1990 census was reported for the population of Sedgwick County and the 1984 census was used for the Wichita population. Therefore, please update these with recent census data.

Clean Harbors Response: The Part B application reflects current population data.

8. In the 2nd Paragraph of page 3, information about a 1992 topographic map was reported. Please update the map with recent information in order to fulfill the requirements of 40 CFR 270.14(b)(19).

Clean Harbors Response: Current topographic map has been provided.

9. On Page 4, please submit a full size figure for Hazardous Waste Management Areas

Clean Harbors Response: A 11X17" facility map has been provided.

10. Figure B.1 through B.4 are missing in page 5 through page 8. Please submit the figures.

Clean Harbors Response: New drawings/figures have been provided.

11. On page 10, 1985 rainfall data was furnished. Therefore, please update with current data.

Clean Harbors Response: Current data has been provided.

12. On page 11, highest temperature of 1954 and lowest temperature of 1882 were furnished. Therefore, please update these with recent data (if any).

Clean Harbors Response: Current weather records have been included in the Part B Application

13. On page 11, wind speed and direction of 1951 to 1960 were furnished. Therefore, please update these with recent data

Clean Harbors Response: Current weather records have been included in the Part B Application

14. Drawing 50-00-01-001 mentioned on page 11 is missing. Please submit the full-scale drawing.

Clean Harbors Response: A new drawing has been provided as required.

15. Drawing 50-01-11-001 mentioned on page 12 is missing. Please submit the full-scale drawing.

Clean Harbors Response: A new drawing has been provided.

16. Figure B.5 mentioned on page 13 on missing. Please submit a full-scale figure.

Clean Harbors Response: A new drawing has been provided.

17. On page 14, traffic data from 1950 were furnished. Therefore, please update with recent data.

Clean Harbors Response: Traffic data from 2006 and 2007 have been provided.

18. The original topographic Map is missing. Therefore, please submit a full-scale map.

Clean Harbors Response: A new topographic map has been provided.

19. The Scale and Date (270.14(b)(19)(i)) are missing. Therefore, please submit full-scale map with this information.

Clean Harbors Response: Map has been up dated.

20. The 100-Year Flood Plain Area (270.14(b)(19)(ii)) mentioned on page 12 is missing. Therefore, please submit the required documentation.

Clean Harbors Response: The 100 year floodplain map/data has been provided.

21. A Wind Rose per 270.14(b)(19)(v) mentioned on page 11 is missing. Therefore, please submit this figure.

Clean Harbors Response: A set of wind rose data has been provided.

22. Map Orientation per (270.14(b)(19)(vi)) is missing. Please submit complete map.

Clean Harbors Response: A map has been provided.

23. Injection and Withdrawal Wells (On Site and Off Site - 270.14(b)(19)(ix)) are missing. Therefore, please submit the required documentation. Please also send a copy to EPA.

Clean Harbors Response: A topographic map of all wells located in the vicinity of the facility was included in the Part A Application.

24. Locations of SWMA^U (if any) are missing. Please let EPA know the locations (if any).

Clean Harbors Response: Clean Harbors is currently assessing the locations of any historic SWMUs and will fully respond to this issue when complete closure notifications are filed in 60 days from May 19, 2008.

25. A Copy of A Federal Insurance Administration or other Flood Map (270.14(b)(11)(iii)) is missing. Therefore, please submit the required documentation.

Clean Harbors Response: The facility is not in a 100 year flood plane, see Section B.

26. Traffic Patterns (270.14(b)(10)) mentioned on page 14 are very old. Please update with recent data.

Clean Harbors Response: Current traffic volumes have been provided.

27. An Estimate of the Number and Types of Vehicles around the Facility per (270.14(b)(10)) on page 14 are very old. Please update with recent data.

Clean Harbors Response: : The facility is not in a 100 year flood plane

28. Traffic Control Signs and Signals (270.14(b)(10)) are missing. Please submit the required information.

Clean Harbors Response: Information on traffic control has been provided.

29. Road Surface Composition and Load-Bearing Capacity per (270.14(b)(10)) mentioned on page 15 are very old. Please update with recent data.

Clean Harbors Response: Road surfaces and load bearing conditions have not changed since the last permit submittal.

SECTION C

30. WAP (Appendix C-A) mentioned on page 1 is missing. Therefore, please submit the Appendix C-A

Clean Harbors Response: The WAP has been updated

31. Attachment C-B mentioned on page 3 is missing. Therefore, please submit the WAP along with Attachment C-B.

Clean Harbors Response: The attachment has been provided.

SECTION D

32. Certification from a Kansas Professional Engineer is required regarding the structural stability of the buildings and the roofs holding the container storage areas.

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer.

33. Figures D-1 and D-2 on pages 3-4 are missing. Therefore, please submit the figures.

Clean Harbors Response: Up-dated figures have been provided as necessary.

34. Figure D.3, Figure D.4, Figure D.5, Figure D.6, Figure D.7, Figure D.8, and Figure D.9 are missing in Appendix D-A. Therefore, please submit the full-scale figures.

Clean Harbors Response: Up-dated figures have been provided as necessary.

35. Appendix D-B is missing. Therefore, please submit the Appendix.

Clean Harbors Response: Up-dated appendix has been provided as necessary.

- 36. Requirement for the Base or Liner to Contain Liquids (270.15; 264.175(b)(1)) is missing. Therefore, please demonstrate that base is impervious to waste stored and precipitation.**

Clean Harbors Response: This issue will be fully addressed when partial closure notifications are filled in 60 days after May 19, 2008.

- 37. Containment System Capacity (270.15(a)(3); 264.175(b)(3)) information is missing. Therefore, please submit the Attachment 1 of Appendix D-B.**

Clean Harbors Response: Containment capacities for those units expected to remain in RCRA service have been up-dated.

- 38. Subsection for Test for Free Liquids (270.15(b)(1)) is missing. Therefore, please submit the documentation that waste does not contain free liquids. Information must be provided by test results or other information.**

Clean Harbors Response:

SECTION E

- 39. Certification from a Kansas professional Engineer is required regarding the structural stability of the buildings and the roofs holding the Tanks.**

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer.

40. Figures on pages 5 and 6 are missing. Please submit full-scale figures.

Clean Harbors Response: Up-dated figures have been submitted as needed.

41. Attachment 1, Attachment 2, Attachment 3, Attachment 4, and Attachment 5 in Appendix E-A are missing. Therefore, please submit the updated Attachments.

Clean Harbors Response: Necessary figures and drawings have been provided to support the portions of the facility which are expected to remain in RCRA service.

42. Tanks V-9 through V-14, V-15A through D, and V-16 were installed in the year 1966 as mentioned in Appendix E-C. These tanks are very old. Therefore, the facility is required to replace these tanks or submit certification of integrity from a Kansas professional engineer.

Clean Harbors Response: It is Clean harbors Kansas, LLCs position that these tanks will be subjected to partial closure.

43. Diagrams of Piping, Instrumentation, and Process Flow (270.16(d)) are missing. Therefore, please submit the required diagram.

Clean Harbors Response: It is Clean harbors Kansas, LLCs position that these tanks will be subjected to partial closure.

44. Certification regarding 'Ignitable, Reactive, and Incompatible Wastes' (270.16(j); 264.17(b); 264.198,199) is missing. Therefore, please submit the certificate of compatibility documenting waste stored is compatible with tank material.

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer. Additional certification will be available when the evaluations are completed. These tanks are not in service at this time.

45. The last paragraph of page 13 states, "When visual inspection of the tank shows no evidence of contamination, the tank system is considered to be available for non-hazardous waste or product service."

Please understand that KDHE does not approve any visual inspection. The facility must perform laboratory analysis before using the tank for non-hazardous or product service.

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer. Additional certification will be available when the evaluations are completed. These tanks are not in service at this time.

46. Assessment of Existing Tank System's Integrity (270.16(a); 264.191) Certification is missing. Therefore, please submit the certification and integrity analysis by a Kansas Professional Engineer.

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer. Additional certification will be available when the evaluations are completed. These tanks are not in service at this time.

47. Appendix E-B is missing. Therefore please submit the Appendix.

Clean Harbors Response: Additional figures have been submitted to support the portions of the facility which Clean harbors Kansas anticipates have in continued RCRA service.

Important KDHE Comment regarding the Tanks

48. Tank systems are not in operations. KDHE needs to know what is the facility's plan regarding the tanks. Please let KDHE know the time frame that the facility will bring them back in operation.

Clean Harbors Response: Clean harbors Kansas is re assessing the utilization of this facility, and intends to effect partial closure on several former storage areas. Tanks and buildings that will be kept in RCRA service are currently scheduled for evaluation by a Kansas professional Engineer. Additional certification will be available when the evaluations are completed. These tanks are not in service at this time.

SECTION F

49. Appendix F-A and Appendix F-B are missing. Therefore, please submit the Appendices.

Clean Harbors Response: Additional figures have been submitted to support the portions of the facility which Clean harbors Kansas anticipates have in continued RCRA service.

SECTION G

50. The Figure on Page 4 is missing. Therefore, please submit the figure.

Clean Harbors Response: Additional figures have been submitted to support the portions of the facility which Clean harbors Kansas anticipates have in continued RCRA service.

51. Appendix G-A missing. Therefore, please submit Appendix G-A.

Clean Harbors Response: Additional figures have been submitted to support the portions of the facility which Clean harbors Kansas anticipates have in continued RCRA service.

52. Figure G.1 is missing. Therefore, please submit the figure.

Clean Harbors Response: Additional figures have been submitted to support the portions of the facility which Clean harbors Kansas anticipates have in continued RCRA service.

53. A Subsection for 'Waiver' (270.14(b)(4); 264.14) is missing. Therefore, please demonstrate that the facility can prevent unknowing entry, and minimize unauthorized entry of persons or livestock.

Clean Harbors Response: Adequate security is in place at the facility and the relevant Sections of the Permit have been updated to address these issues.

54. A Subsection for 'Injury to Intruder' (270.14(b)(4); 264.14) is missing. Therefore, please demonstrate that the physical contact with waste, structure, or equipment will not injure an unknowing intruder.

Clean Harbors Response: Adequate security is in place at the facility and the relevant Sections of the Permit have been updated to address these issues.

55. A Subsection for 'Violation Caused by Intruder' (270.14(b)(4); 264.14) is missing. Therefore, please demonstrate that the disturbance of waste or equipment by an unauthorized intruder will not cause a violation.

Clean Harbors Response: Adequate security is in place at the facility and the relevant Sections of the Permit have been updated to address these issues.

56. A Subsection for 'Types of Problems' (270.14(b)(5); 264.15(b)(3)) is missing. Therefore, please make sure that the Inspection checklist must identify types of problems.

Clean Harbors Response: Detailed copies and descriptions of current inspection procedures are included in the Part B Application to address this issue.

57. Sample checklists are missing. Therefore, please submit the sample checklists.

Clean Harbors Response: Detailed copies and descriptions of current inspection procedures are included in the Part B Application to address this issue.

58. A Subsection for 'Schedule of Remedial Action' (270.14(b)(5); 264.15(c)) is missing. Therefore, please demonstrate that the facility will immediately remediate any deterioration or malfunction of equipment or structures to ensure the problem does not lead to an environmental or human health hazard.

Clean Harbors Response: This section will be fully addressed when the schedules for partial closure are filed with KDHE.

59. A Subsection for 'Inspection Log' (270.14(b)(5); 264.15(d)) is missing. Therefore, please submit sample Inspection log.

Clean Harbors Response: Detailed copies and descriptions of current inspection procedures are included in the Part B Application to address this issue.

60. A Subsection for 'Testing and Maintenance of Equipment' (270.14(b); 264.33) is missing. Therefore, please demonstrate that the communication, alarm, fire control equipment, spill control equipment, and decontamination equipment are tested and maintained.

Clean Harbors Response: Detailed copies and descriptions of current inspection procedures are included in the Part B Application to address this issue.

61. Documentation of arrangement with Police/Fire Department (270.14(b); 264.37(a)(1)) is missing. Therefore, please submit the documentation.

Clean Harbors Response: The appropriate letters have been provided.

62. Documentation of arrangement with Local Hospital (270.14(b); 264.37(a)(4)) is missing. Therefore, please submit the documentation.

Clean Harbors Response: The appropriate letters have been provided.

63. Documentation of Adequacy of Procedures for handling ignitable or reactive waste and mixing of incompatible waste (270.14(b); 264.17(c)) is missing. Therefore, please document these from published literature, trial test, waste analyses etc.

Clean Harbors Response: Updated procedures are included in Section C.

64. Subsection for 'Management of incompatible waste placed in containment' is missing. Therefore, please submit the required documentation.

Clean Harbors Response: Updated procedures are included in Section D and Section E.

SECTION H

65. Figure H-1 on page 6 is missing. Therefore, please submit Figure H-1.

Clean Harbors Response: The appropriate figure has been included.

66. Appendix H-C, and Appendix H-D are missing. Therefore, please submit the appendices.

Clean Harbors Response: Appendix A has been removed from the Contingency Plan. As such, Appendix B, C and D have been changed to Appendix A, B, and C, respectively. The missing coordination letters have been incorporated into the contingency plan. These are from a submittal that was made in June 6, 2007. Please keep in mind that new coordination letters will have to be prepared after this contingency plan is approved in the renewed permit. It would be premature to submit this plan to emergency agencies when the plan has not been approved by

KDHE. The plan was also modified to reflect the current emergency coordinators in Section H-3.

- 67. A Subsection for 'Incompatible Waste' (270.14(b)(7); 264.56(h)(1)) is missing. Therefore, please submit the documentation that until cleanup is complete, the incompatible waste is not stored together.**

Clean Harbors Response: A sentence was added to the sixth bullet in Section H-5f under Post-Emergency Activities stating if it is discover that incompatible waste are stored next to each other, the incompatible waste will be moved to a safe location away from the other incompatible waste.

- 68. A Subsection for 'Provisions of Secondary Containment, Repair, or Closure' (270.14(b)(7); 264.196(e)) is missing. Therefore, please submit the documentation regarding the provision of secondary containment repair. If secondary containment cannot be repaired, closure is required.**

Clean Harbors Response: Another bullet was added to Section H-5f under Post-Emergency Activities reflecting the criteria of comment number 68.

SECTION J

- 69. Please rewrite the last paragraph of page 1 stating that the facility will submit a post-closure plan in the event the facility cannot achieve clean closure.**

Clean Harbors Response: This item will be fully described in the finial closure Plan, which will be submitted with the notifications of intent to partially close severa areas of the current facility.

- 70. Figure at page34 is missing. Therefore, please submit the Figure.**

Clean Harbors Response: The appropriate figure has been included.

- 71. Figure at page 42 is missing. Therefore, please submit the Figure.**

Clean Harbors Response: The appropriate figure has been included.

72. Figure at page 43 is missing. Therefore, please submit the Figure.

Clean Harbors Response: The appropriate figure has been included.

73. Figure at page 50 is missing. Therefore, please submit the figure.

Clean Harbors Response: The appropriate figure has been included.

74. Appendix J-B is missing. Therefore, please submit the Appendix.

Clean Harbors Response: The appropriate figure has been included.

75. A Subsection for 'Inventory Removal' (270.14(b)(13); 264.112(b)(3)) is missing. Therefore, please add a subsection describing the methods for removing, transporting, treating, storing, or disposing of all hazardous wastes and identify the type(s) of off-site hazardous waste management units to be used.

Clean Harbors Response: The Section of Closure will be re-written to reflect the process areas that are going to under go partial closure. The Closure document will be rewritten and submitted when the partial closure notifications are filed with KDHE.

76. A Subsection for 'Certification of Closure' (270.14(b)(13); 264.115; 264.280) is missing. Therefore, please add a paragraph in the closure plan stating that a closure certification will be provided at the end of closure by the facility and by an independent Kansas professional engineer.

Clean Harbors Response: The Section of Closure will be re-written to reflect the process areas that are going to under go partial closure. The Closure document will be rewritten and submitted when the partial closure notifications are filed with KDHE.

77. A Subsection for 'Survey Plat' (270.14(b)(13); 264.116) is missing. Therefore, please submit the survey plat.

Clean Harbors Response: A Survey of the facility boundaries is being scheduled in the near future to provide an up to date legal survey of the property. This document will be forwarded to KDHE as soon as it is available as an amendment to this Permit Application.

78. A Subsection for 'Closure Cost Estimate' (270.14(b)(15); 264.142) is missing. Therefore, please submit a closure cost estimate. The closure cost estimate must equal the final cost estimate. Estimate must be based on a third party closing the facility. The Estimate must be adjusted for annual inflation as stated in 264.142 (b).

Clean Harbors Response: The Section of Closure will be re-written to reflect the process areas that are going to under go partial closure. The Closure document will be rewritten and submitted when the partial closure notifications are filed with KDHE.

SECTION K

79. Appendix K-A containing 'Financial Assurance for Closure' (270.14(b)(15); 264.143; 264.151) is very old. Please update this Appendix with recent data.

Clean Harbors Response: The Section of Closure will be re-written to reflect the process areas that are going to under go partial closure. The Closure document will be rewritten and submitted when the partial closure notifications are filed with KDHE.

80. Appendix K-B and Appendix K-C are missing. Therefore, please submit the updated Appendices.

Clean Harbors Response: The appropriate figure has been included.

SECTION - M

81. Fig. M1 in page 1 is missing. Therefore, please submit the figure

Clean Harbors Response: The appropriate figure has been included.

82. On page 34, Appendix M-A refers to Figures M.2 through M.12. As such Figure M.2 through M.12 are missing. Therefore, please submit the figures.

Clean Harbors Response: The appropriate figure has been included.

83. Appendices M-B through M-E are missing. Therefore, please submit the Appendices.

Clean Harbors Response: The appropriate figure has been included.

Important KDHE Comment regarding the Miscellaneous Units

84. Miscellaneous Units are not in operation. KDHE needs to know what is the facility's plan regarding the miscellaneous units. Please let KDHE know the time frame that the facility will bring them back in operation.

Clean Harbors Response: Clean Harbors Kansas, LLC intends to remove and decommission, and effect partial closure on the areas and equipment described as "Miscellaneous Process Equipment".

SECTION N

85. The Description in page 1 considers the facility as an interim status facility. The facility is not an interim status facility. Therefore, please revise this page.

Clean Harbors Response: Corrected.

86. All the drawings mentioned in Appendix N-A are missing. Therefore, please submit the drawings.

Clean Harbors Response: The appropriate figure has been included.

87. Appendices N-B through N-F are missing. Therefore, please submit the Appendices.

Clean Harbors Response: The appropriate figure has been included.

88. A Subsection on 'Semiannual Report' (270.25(a); 264.1065) is missing. Therefore, please submit the subsection.

Clean Harbors Response: Semiannual reports are described,. And submitted as required.

89. A Subsection on 'Implementation Schedule' (270.25(b)) is missing. Therefore, please submit the subsection.

Clean Harbors Response: The appropriate figure has been included.

Subpart CC Air Emission Standards

90. The facility is required to meet the Subpart CC Air Emission Standards. Please contact Ms. Chris Jump of US EPA Region 7 regarding the requirements of this Subpart.

Clean Harbors Response: Clean harbors Kansas, LLC, and Operations and Environmental staff from Clean harbors Environmental Services Inc., would like to conduct a meeting in the near future to discuss this and any other issues relating to this facility.

Groundwater Requirements

91. Please contact Ms. Chris Jump of US EPA Region 7 regarding the groundwater requirements.

Clean Harbors Response: Clean harbors Kansas, LLC, and Operations and Environmental staff from Clean harbors Environmental Services Inc., would like to conduct a meeting in the near future to discuss this and any other issues relating to this facility.

Notice in Deed

92. According to KAR 28-31-8 (c), the owner of the property on which a hazardous waste treatment, storage, or disposal facility is located shall record in accordance with Kansas law, a notice with the county register of deeds where the property is located that the land has been used to manage hazardous wastes and all the records regarding permits, closure, or both are available for review at the department. If you already have a 'Notice in Deed to property', please forward a copy.

Clean Harbors Response: We are conducting a records search to locate this document. It will be provided to KDHE as an amendment to this Permit Application.

PART B CERTIFICATION

93. Part B Certification (270.11) is missing. Therefore, please submit the certification.

Clean Harbors Response: A new certification is being prepared and will be forwarded to KDHE as an amendment to this Permit Application.